



March 16, 2022

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street
New York, New York 10007

Re: **Paguada v. Cooks Venture, Case #22-cv-00925**

Dear Judge Furman:

We represent defendant Cooks Venture, Inc. (the “Defendant”) in the above litigation. I write to respectfully request extensions of two separate deadlines, both with consent of counsel for the plaintiff Josue Paguada (the “Plaintiff”).

First, Defendant respectfully requests a three-week extension of the time for Defendant to respond to the complaint from the original date of March 18, 2022 to April 8, 2022. Plaintiff’s counsel has consented to this request. The reason for this request is to provide the parties time to engage in settlement talks before Defendant is required to respond to the complaint. This is the first request for an extension.

Second, Defendant respectfully requests a small extension of time for the parties to submit the joint letter, as set forth in the Court’s Order of February 7, 2022 (Doc. #5). The current deadline is twenty (20) days from the date Defendant’s counsel first appears, which would be April 5, 2022. Defendant requests an extension to the April 8, 2022 date for the response to the complaint. Plaintiff’s counsel has consented to this request. The reason for this request is to provide the parties time to engage in settlement talks before the parties are required to proceed further with the litigation. This is the first request for an extension.

We thank you for your consideration of these requests.

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Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Jocelyn Jacobson".

Jocelyn Jacobson

cc: Counsel of Record via ECF

Application GRANTED. The Clerk of Court is directed to
terminate ECF No. 8.

SO ORDERED.

A handwritten signature in cursive script, appearing to read "Jau [unclear]".

March 16, 2022